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By ECF

May 29, 2019

Hon. Vernon Broderick
Thurgood Marshall
United States Courthouse
40 Foley Square
New York, NY 10007

Re: *Great Western Ins. Co. v. Mark Graham et. al.* (No. 18-cv-6249 (VSB))

Your Honor:

I represent Defendant Gregory Tolaram and I write in response to the letter filed by Plaintiff Great Western last night (Doc. No. 173), which addresses certain scheduling and procedural issues relating to Mr. Tolaram's motion to dismiss filed on May 21, 2019.

Mr. Tolaram does not object to limited jurisdictional discovery relating to his business contacts with New York, but the schedule proposed by counsel is simply not workable for my client or myself. We respectfully suggest the following:

- June 19, 2019 – Deposition of Mr. Tolaram on jurisdiction issues via telephone.
- No later than June 17, 2019, Mr. Tolaram shall produce all documents related to (1) the November 2017 meeting in New York, and (2) any other meetings attended by Mr. Tolaram in New York related to any of the defendants named in this lawsuit.
- June 26, 2019 – Mr. Tolaram shall complete his review of the deposition transcript and submit any errata sheets with respect thereto (on the assumption that the transcript will be available within 48 hours of the deposition).
- July 3, 2019 – Great Western's opposition to Mr. Tolaram's motion to dismiss due.
- July 17, 2019 – Mr. Tolaram's reply papers shall be due.

In the event the Court orders dates that do not adopt the above schedule, I respectfully request that the due date for my reply submission not fall between June 27 and July 9, as I am scheduled to be out of the country during that time period for work and also for a wedding.

Respectfully,

Andy S. Oh